



Control Number: 51415



Item Number: 267

Addendum StartPage: 0

SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415

APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE
ELECTRIC POWER COMPANY FOR § OF
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS

**SOUTHWESTERN ELECTRIC POWER COMPANY'S
STATEMENT UNDER SECTION 4 OF PROTECTIVE ORDER**

Certain documents provided in response to Cities Advocating Reasonable Deregulation's (CARD) Seventh Request for Information to Southwestern Electric Power Company (SWEPCO), Question Nos. 7-5, 7-23, and 7-27 are exempt from public disclosure pursuant to Sections 552.110 of the Public Information Act¹ and are subject to treatment as Confidential and/or Highly Sensitive materials.

The materials provided in response to CARD's Question Nos. 7-5, 7-23, and 7-27 contain non-public commercially-sensitive project-planning information such as firm capacity data, unit disposition and economic viability analyses based on various commodity pricing and operation assumptions, and target inventory as well as other operation and planning information concerning coal units, that if released, would provide an advantage to a competitor or bidder and could cause substantial competitive harm to SWEPCO.

Counsel for SWEPCO has reviewed the documents sufficiently to state in good faith that the documents are exempt from disclosure under the Public Information Act and merit the Confidential and/or Highly Sensitive designations given to them.

¹ Tex. Gov. Code Ann. § 552.001-.353.

Respectfully submitted,

Melissa Gage
State Bar No. 24063949
Email: magage@aep.com
aepaustintx@aep.com (Service)

Leila Melhem
State Bar No. 24083492
Email: lmelhem@aep.com
aepaustintx@aep.com (Service)

400 West 15th Street, Suite 1520

Austin, Texas 78701

Telephone: (512) 481-3320

Facsimile: (512) 481-4591

**AMERICAN ELECTRIC POWER SERVICE
CORPORATION**

William Coe
State Bar No. 00790477
Email: wcoe@dwmrlaw.com

Kerry McGrath
State Bar No. 13652200
Email: kmcgrath@dwmrlaw.com

Patrick Pearsall
State Bar No. 24047492
Email: ppersall@dwmrlaw.com

Stephanie Green
State Bar No. 24089784
Email: sgreen@dwmrlaw.com

P.O. Box 1149

Austin, Texas 78767

Telephone: (512) 744-9300

Facsimile: (512) 744-9399


DUGGINS WREN MANN & ROMERO, LLP

By: 
Stephanie Green

**ATTORNEYS FOR SOUTHWESTERN
ELECTRIC POWER COMPANY**

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on March 19, 2021, in accordance with the Second Order Suspending Rules issued in Project No. 50664 and Order No. 1 in this matter.

A handwritten signature in cursive script that reads "Stephanie Green".

Stephanie Green